



southern
utah
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DIV. OF OIL, GAS & MINING

July 7, 2004

VIA HAND DELIVERY AT THE INFORMAL CONFERENCE

Lowell P. Braxton, Director
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Incoming
C/007/0013 *OK*

RE: Outline of Comments and Objections Presented During the Informal Conference
for the Lila Canyon Extension, UtahAmerican Energy, Inc., Horse Canyon Mine,
C/007/0013, Task ID #1859

Dear Mr. Braxton,

The Southern Utah Wilderness Alliance (SUWA) appreciates the opportunity to provide you with an outline of the comments we presented during the Informal Conference in the above referenced matter. In addition to the comments outlined below, SUWA is confident that the Division will require UtahAmerican Energy Inc. (UEI) to correct all of the deficiencies that either they or the Board have previously recognized. The informal conference held today, as well as the continued submissions by UEI and analyses by the Division, may disclose other concerns related to the technical adequacy of the permit application package (PAP) that SUWA may address through additional comments submitted during the technical review process. It should be noted that the citations below are for reference, and do not represent an exhaustive list of the rules, regulations, or laws applicable to SUWA's concerns.

1. **Acid- or toxic-forming materials.** Rule 624.300 requires the applicant to collect samples from test borings or drill holes and analyze these samples for acid- or toxic-forming materials. Specifically, Rule 624.320 requires the applicant to perform chemical analyses for acid- or toxic-forming or alkalinity-producing materials and their content in the strata immediately above and below the coal seam to be mined.

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File in:

C/0070013, 2004, *Incoming*

Refer to:

☐ Confidential

☐ Shelf

☒ Expandable

Date: 070704 for additional information